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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SYNOPSYS, INC.,

Plaintiff,

vs.

RICOH COMPANY, LTD.,

Defendant.

RICOH COMPANY, LTD.,

Plaintiff,

vs.

AEROFLEX INCORPORATED, et al.,

Defendants

CASE NO. C-03-2289-MJJ

CASE NO. C-03-4669-MJJ

**RICOH'S RE-NOTICE OF MOTION FOR
SANCTIONS (PURSUANT TO COURT'S
ORDER OF DECEMBER 19, 2003)**

Date: February 10, 2004

Time: 9:30 a.m.

Courtroom: 11

NOTICE OF MOTION AND RELIEF REQUESTED

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that, pursuant to the Court's Order of December 19, 2003, on February 10, 2004, at 9:30 a.m. in Courtroom 11 of the above-referenced court plaintiff and declaratory judgment defendant Ricoh Company, Ltd. ("RicoH"), will bring on for hearing its motion for sanctions against declaratory judgment plaintiff Synopsys, Inc. ("Synopsys") in Case No. C-03-2289-MJJ; accused infringement defendants Aeroflex Incorporated ("Aeroflex"), AMI Semiconductor, Inc. ("AMI"), Matrox Electronic Systems Ltd. ("Matrox"), Matrox Graphics Inc. ("Matrox Graphics"), Matrox Int'l. Corp. ("Matrox Int'l.") and Matrox Tech Inc. ("Matrox Tech") (collectively the "ASIC defendants") in Case No. C-03-4669-MJJ; and counsel for the foregoing parties in both cases, Howrey, Simon, Arnold & White ("Howrey"). This motion is based upon the intentional actions of Synopsys, the ASIC defendants and Howrey to wrongfully induce Ricoh's consulting expert, Dr. Thomas, to break his agreement with Ricoh, switch sides to become a consulting expert to Synopsys, misrepresent the relevant facts to Judge Sleet of the District of Delaware, then fail to comply with the Court's order with respect to the Court's investigation of the apparent fraud on the Court.

Ricoh bases this motion upon its Memorandum of Points and Authorities (previously filed on December 2, 2004), the supporting declarations and evidence, Ricoh's reply brief (previously filed on December 23, 2004), all pleadings on file in these cases, and such argument as may be heard by this Court.

Dated: January 6, 2004

Respectfully submitted,

Ricoh Company, Ltd.

By: Ken Brothers

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